

**BEFORE THE  
DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION  
WASHINGTON, D.C.**

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**IN THE MATTER OF**

**Petition of Helinet Aviation Services for Exemption**

**Docket No. FAA-2019-0462**

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**COMMENTS OF THE SMALL UAV COALITION**

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**COMMENTS OF THE SMALL UAV COALITION**

The Small UAV Coalition<sup>1</sup> is pleased to provide its comments in support of the petition by Hogan Lovells on behalf of Helinet Aviation Services, LLC (“Helinet”) for an exemption under section 44807 to allow Helinet to operate the Shotover U1 unmanned aircraft system (“UAS”) weighing 88.2 lbs. for closed-set motion picture and television filming.

Members of the Small UAV Coalition share an interest in advancing regulatory and policy changes that will permit the operation of UAS in the near term within and beyond the line of sight, with varying degrees of autonomy, for commercial and other civil purposes. This includes operations of aircraft heavier than 55 lbs. The Coalition believes that granting this petition will help advance this objective.

The only relief from regulations Helinet seeks is relief previously granted by FAA in a number of exemptions. In particular, Helinet seeks permission to use pilots who do not hold a commercial pilot certificate or medical certificate to conduct operations for compensation or hire. The Coalition believes that Part 61 certificates and Helinet’s training and qualifications requirements are more than adequate to achieve an equivalent level of safety.

As for operations of UAS over 55 lbs., Helinet explains that its UAS operations will be conducted only on closed sets with physical barriers and security personnel to maintain the perimeter around the set. The UAS will be operated at least 500 feet from non-participants, below 400 feet above ground level (“AGL”), and within the visual line of sight of the remote pilots.

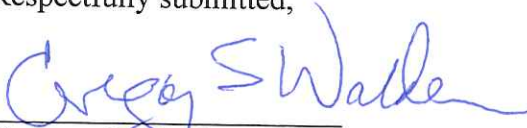
In sum, the Small UAV Coalition supports Helinet’s petition for exemption, in consideration of the many safety features detailed in its petition and the particular operational environment where

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<sup>1</sup> Members of the Small UAV Coalition are listed at [www.smalluavcoalition.org](http://www.smalluavcoalition.org).

UAS operations will eliminate the risk to persons on the ground and to manned aircraft. Accordingly, the Coalition requests the FAA grant Helinet's petition for exemption in full.

Respectfully submitted,



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